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July 31, 2006

By CM/ECF and Hand Delivery

The Honorable Sue L. Robinson
Chief Judge
United States District Court for the District of Delaware
U.S. Courthouse
844 N. King Street
Wilmington, DE 19801

Re: *Koken v. GPC International, Inc.* D. Del., C.A. No. 05-223 (SLR)

Dear Judge Robinson:

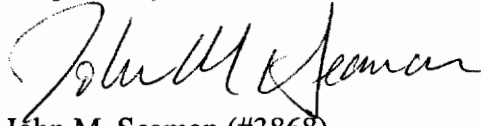
I write on behalf of Defendant and Third-Party Plaintiff, GPC International, Inc. ("GPC"), to transmit two additional documents concerning a related proceeding in California that is potentially dispositive of the principal part of this action, which we received after briefing was complete on GPC's Motion for Adjournment of Discovery Schedule and Trial and Amendment of Scheduling Order, served June 13, 2006 (the "Motion to Adjourn") (D.I. 56):

- a. The Amended Petition for Contribution/Reimbursement (with exhibits) of the California Insurance Guarantee Association ("CIGA"), filed on July 21, 2006, with the Workers' Compensation Appeals Board of the State of California, in *Frank Jamaica v. GPC International, et al.*, Cal. WCAB Case Nos. ANA 0311896 & 03119897 (the "Amended Petition"); and
- b. A letter faxed to GPC on July 24, 2006, from counsel for CIGA, identifying the date for the arbitration hearing on CIGA's Amended Petition as November 30, 2006 ("Scheduling Letter").

CIGA's Amended Petition seeks reimbursement from Zurich for the amounts CIGA allegedly paid, while acting in place of Reliance Insurance, on the worker's compensation claims of Frank Jamaica in California. Plaintiff, as liquidator of Reliance Insurance, maintains in this action that CIGA's alleged payments give rise to the great majority of the retrospective premium adjustments sought by Plaintiff from GPC. Pursuant to D. Del. LR 7.1.2(c), GPC respectfully submits that the Amended Petition and Scheduling Letter provide additional support for its Motion to Adjourn.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "John M. Seaman". The signature is fluid and cursive, with the first name "John" and last name "Seaman" clearly distinguishable.

John M. Seaman (#3868)

cc: Sheldon K. Rennie, Esq., counsel for Plaintiff (by CM/ECF and hand delivery)
Gerald E. Arth, Esq., counsel for Plaintiff (by CM/ECF and FedEx)
Sean J. Bellew, Esq., counsel Third-Party Defendant (by CM/ECF and hand delivery)
Herbert C. Ross, Jr., Esq., counsel for Defendant (by FedEx)